



United States Department of Justice

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Northern District of New York

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January 10, 2023

VIA ECF

Hon. Thomas J. McAvoy
Senior U.S. District Judge
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: *United States v. Christopher Pence*, case no. 21-CR-393 (TJM)

Dear Judge McAvoy:

I write respectfully on behalf of the government to request a two-week extension of the government's response date to the above defendant's motion for omnibus relief (Dkt. 21), currently scheduled for January 10, 2023.

Defense counsel has consented to the requested two-week extension.

If the Court consents to grant the requested extension of the government's response date to January 24, 2023, the government submits that the defense's reply brief would then be due on January 31, 2023.

The government thanks the Court for its consideration of this request.

Very truly yours,

CARLA B. FREEDMAN
United States Attorney

By: /s/ Emmet J. O'Hanlon
Emmet J. O'Hanlon
Assistant United States Attorney
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